

**BEFORE THE KPK SERVICE TRIBUNAL, PESHAWAR**


E. P. No. 735/2023  
IN  
S. A. No. 1280/2013

Khalid Saleem Marwat                      versus                      Chief Secretary & Others

**I N D E X**

S.#	Description of Documents	Annex	Page
1.	Memo of Objection Petition		1-2
2.	Notification dated 11-09-2024		3

Applicant  
Through

  
(Saadullah Khan Marwat)  
Advocate  
21-A Nasir Mension,  
Shoba Bazar, Peshawar.  
Ph: 0300-5872676

Dated: 17-10-2024

28-10-24  
Pesh.

**BEFORE THE KPK, SERVICE TRIBUNAL, PESHAWAR**

E. P. No. 735 / 2023  
IN  
S. A. No. 1280/2013

Khalid Saleem Marwat                      versus                      Chief Secretary & Others

**OBJECTION PETITION OVER NOTIFICATION DATED 11-09-2024 OF  
THE RESPONDENTS:**

**Respectfully Sheweth,**

1. That on 02-09-2013, applicant filed appeal before this hon'ble Tribunal to set aside Notifications dated 30-05-2011, 27-10-2011 and 04-07-2013 of the respondents and to give him proforma promotion to B-19 for monetary benefits since 30-05-2011.
2. That the said appeal came up for hearing before the hon'ble Tribunal and after due deliberation the same was accepted with conclusion that applicant has valid reasons on facts, circumstances and material on record for proforma promotion with effect from the due date. The appeal was therefore allowed as prayed for vide judgment dated 14-09-2022.
3. That the said judgment was remitted to the department for compliance but no heed was paid to the same, so Execution Petition was filed before the hon'ble Tribunal for the said purpose.
4. That Execution Petition was fixed for hearing on 16-09-2024 and the respondents submitted compliance report dated 11-09-2024 wherein the judgment was partially implemented. (copy attached)
5. That in the Notification dated 11-09-2024, proforma promotion from B-18 to B-19 was granted and retiring applicant with effect from 29-04-2012. Actually the retiring date is correct according to the date of birth of the applicant, but the promotion to B-19 needs to be altered to that of 30-05-2011 on which date the juniors to the applicant were promoted.

6. That Notification dated 11-09-2024 requires modification / correction to show him promoted to B-19 with effect from 30-05-2011 to honor the judgment of the hon'ble Tribunal by giving the monetary benefits since 30-05-2011.
7. That if the judgment of the hon'ble Tribunal was implemented in letter and spirit then there would be no need to file the instant Objection Petition for the purpose.

It is, therefore most humbly prayed that Notification dated 11-09-2024 be modified / corrected as per the the judgment, i.e. 30-05-2011.

*Muhammad*  
Applicant

Through

*Saadullah Khan Marwat*  
Saadullah Khan Marwat  
Advocate,

Dated: 17-10-2024

**AFFIDAVIT**

I, Khalid Saleem Marwat (applicant), do hereby solemnly affirm and declare that contents of Objection Petition are true and correct to the best of my knowledge and belief.

*Muhammad*  
DEPONENT



*Objectives*



3  
GOVERNMENT OF  
KHYBER PAKHTUNKHWA  
ESTABLISHMENT DEPARTMENT

Dated Peshawar, the September, 11, 2024

NOTIFICATION

NO:SO(E-I)E&AD/4-472/2024. In pursuance of the Khyber Pakhtunkhwa Service Tribunal Judgment in Service Appeal No. 1280/2013, dated 12.06.2024 and on the recommendations of the Provincial Selection Board, in its meeting held on 16.08.2024, Mr. Khalid Saleem (Retd. PCS EG) is hereby granted poforma promotion from BS-18 to BS-19, for one day before his retirement i.e 29.04.2012, as his date of birth is 30.04.1952.

*Current date*  
30/5/11

CHIEF SECRETARY  
GOVERNMENT OF KHYBER PAKHTUNKHWA

Endst. No. & date even

Copy forwarded to the:-

1. Additional Chief Secretary, P&D Department.
2. Senior Member Board of Revenue, Khyber Pakhtunkhwa.
3. Principal Secretary to Governor, Khyber Pakhtunkhwa.
4. Principal Secretary to Chief Minister, Khyber Pakhtunkhwa.
5. Accountant General, Khyber Pakhtunkhwa.
6. Registrar Khyber Pakhtunkhwa, Service Tribunal, Peshawar.
7. Director General, Information & PRS Department.
8. PSO to Chief Secretary, Khyber Pakhtunkhwa.
9. PS to Secretaries, Establishment & Administration Department.
10. PS SS(E)/SS(Reg)/AS(HRD)/AS(E)/ DS(E.)/SO(E.II)/SO(E.V) E&AD.
11. PA to DS(A)/SO(Secret)/Estate Officer/ACSO Cypher/Dy. Director (IT) and Director Protocol Administration Department.
12. Section Officer (Litigation), E&AD.
13. Officer concerned.
14. Controller, Govt. Printing Press, Peshawar.

SULAIMAN SHAH

*IMDAD KHAN*  
12/09/24

SECTION OFFICER (E-I)  
Ph. # 091-9210529

*Attest*